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**COMMUNITY ADVISORY COMMITTEE, SUNSHINE CANYON LANDFILL
CITY OF LOS ANGELES
12045 Susan Drive, Granada Hills, CA 91344**

MEMBERS: Dr. Wayne Aller, Mary Edwards, Wayde Hunter, Mollie Molay
Robert Norris, Anne Ziliak

CHAIRPERSON: Ralph Kroy

California Integrated Waste Management Board
1001 I Street
P.O. Box 4025
Sacramento, CA 95812-4025



701-H

Attention: Mark de Bie, Division Chief
California Integrated Waste Management Board
Waste Compliance and Mitigation Program
Permitting and LEA Support Division

RE: Solid Waste Facilities Permit Application, Browning-Ferris Industries/Allied Waste
Sunshine Canyon Landfill

Dear Board Members:

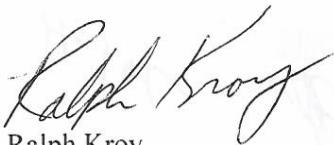
The Community Advisory Committee (CAC) for the City of Los Angeles at a regularly schedule meeting on February 21, 2008 and unanimously passed a motion to oppose the CIWMB granting a Solid Waste Facilities Permit for a Combined City/County Landfill.

This application has been a series of missteps by the applicant and has compromised our ability to serve as liaison between the permittee and the community, and to communicate with the City's Technical Advisory Committee (TAC) on Sunshine Canyon. Specifically that:

- 1) BFI failed to notify us timely in a timely manner when they filed the first time in 2007 and again in February 2008, as required under Q-Condition 13 of their CUP. Under this condition they are required to keep the CAC apprised on an ongoing basis regarding issues involved in the development and operation of the landfill.
- 2) A copy of the JTD for the City/County CACs for Sunshine Canyon Landfill which had been requested at previous meetings was only delivered by BFI on January 18, 2008 as a loaner for 7 days, saying that it was too expensive to supply a copy for our own use. On January 23, 2008 they retook possession, saying it was their only copy and that the State had demanded it for use downtown. Also we are not in receipt of copies of the amended material submitted on February 6, 2008.
- 3) BFI was fully aware of the conditions of their CUP under Condition 9 with the full knowledge that a 5-year phasing plan on combining the City and County landfills was in force. They were also aware that the City and the County had been working together on a Memorandum of Understanding (MOU) and a Joint Powers Agreement (JPA) to address the combined landfill's lead LEA.

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- 4) We believe that there is no capacity shortage, that this is an effort to circumvent the established phasing plan. At our meeting in February BFI admitted that activity was occurring in the bridge area. While the County contemplated some activity on the County side of the bridge area it was suppose to occur only with City approval. Questions directed to the City's LEA indicate that no such approvals have been given and requests by the City CAC for written proof of that approval have not yet been supplied.
 - 5) The Regional Water Quality Control Board, Los Angeles Region, reviewed the Joint Technical Document and in a February 7, 2008 letter found it to be incomplete due to deficiencies.
 - 6) The final closure for the old City Landfill (Unit 1) has not occurred despite its "closure" in 1991. This lack of final closure approved by the State and its impacts to the surrounding community are a permanent item on our agenda.

Yours truly,



Ralph Kroy
Chairman City CAC

c.c. Councilman Grieg Smith 12th District
Wayne Tsuda, Environmental Affairs Department, City of Los Angeles

WA/rk